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PB-259 654

EVALUATION REPORT ON WATER POLLUTION CONTROL PROGRAM PLAN FOR THE STATE OF COLORADO DEPARTMENT OF PUBLIC HEALTH WATER POLLUTION CONTROL DIVISION, FY 1971

FEDERAL WATER POLLUTION CONTROL ADMINISTRATION,
KANSAS CITY, MISSOURI

SEPTEMBER 1970

316027

PB 259 654

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FOR THE STATE OF COLORADO
DEPT. OF PUBLIC HEALTH
WATER POLLUTION CONTROL DIVISION
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Sept. 1970

NTIS 1/74
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EVALUATION REPORT

WATER POLLUTION CONTROL PROGRAM PLAN
FOR THE STATE OF COLORADO
DEPARTMENT OF PUBLIC HEALTH
WATER POLLUTION CONTROL DIVISION
FY 1971

U. S. Department of the Interior
Federal Water Quality Administration
Missouri Basin Region, Planning and Program Grants
Kansas City, Missouri September 1970

BIBLIOGRAPHIC DATA SHEET	1. Report No.	2.	3. Recipient's Accession No. PB-259 654

4. Title and Subtitle
Evaluation Report on Water Pollution Control Program Plan for the State of Colorado Department of Public Health Water Pollution Control Division, FY 1971.

5. Report Date
September 1970

6.

7. Author(s)

8. Performing Organization Rept. No.

9. Performing Organization Name and Address
Federal Water Pollution Control Administration
Kansas City, Missouri
Missouri Basin Region

10. Project/Task/Work Unit No.

11. Contract/Grant No.

12. Sponsoring Organization Name and Address

13. Type of Report & Period Covered

14.

15. Supplementary Notes
(PC A03/MF A01)

16. Abstracts
Contents:
Status of interstate and intrastate water quality standards; Improvements or expansion proposed by the agency; General adequacy of the agency's staff, budget, organization, and statutes; FWQA Recommendations which are most urgent for improving the state program; Additional comments; Summarize known accomplishments during the previous fiscal year; Pollution control surveillance and enforcement; Water pollution control facilities; Training; Pollution control studies and planning; Public information; Evaluation rating.

17. Key Words and Document Analysis. 17a. Descriptors

*Water pollution abatement
*Project planning
*Colorado
Standards
Recommendations
Statutes
Law enforcement
Sewage treatment
Industrial waste treatment
Municipalities
Education
Information
Agriculture
Evaluation

17b. Identifiers/Open-Ended Terms

*Water pollution standards
Interstate commissions

17c. COSATI Field/Group 13B

18. Availability Statement	19. Security Class (This Report)	21. No. of Pages
National Technical Information Service Springfield, VA 22161	UNCLASSIFIED	36
	20. Security Class (This Page) UNCLASSIFIED	22. Price PC$4.00/ MF$3.00

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SUMMARY EVALUATION

COLORADO

FISCAL YEAR 1971 PROGRAM PLAN

EVALUATION RATING: GOOD ADEQUATE MARGINAL POOR

1. STATUS OF INTERSTATE AND INTRASTATE WATER QUALITY STANDARDS:

Water Quality Standards were approved October 21, 1968, with some exceptions. These exceptions have not been resolved although efforts are being made to do so; public hearings have been held to make the necessary changes. The State has not adopted an anti-degradation statement.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

Secure approval of standards previously excepted.
Planning to initiate CAMPS program.
Initiate ground water study at Rocky Mountain Arsenal.
Employ an aquatic biologist (have none at present).
Implement State financial assistance law (not a true construction grant program, but is a distressed area grant).
Develop operator training program.
Determine feedlot waste treatment needs.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES:

We believe that statutory authority is adequate. The agency is severely understaffed and under-financed. The position of the agency director is too subordinated in the State organization to exert effective leadership. He apparently does not sign any official documents including the State Plan. The plan calls for a 1.0 man-year increase and a $51,566 increase in actual operating funds. This amounts to 12¢ per capita on State financing or 17¢ per capita on total funds.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

The most urgent need is man-power. The agency needs bacterial and biological expertise within its own ranks; it has none now. The agency needs to open, staff, and support district offices so that staff can more effectively monitor water quality and thus attack problems earlier. More effective assistance could be given to municipalities and industries through district offices. Additional staff requirements: Three engineers, three sanitarians, three aids, and three clerks are needed as a minimum to fill new district offices. At headquarters, an aquatic biologist, a bacteriologist, two biological science aids, and a clerk are needed. Another public information aid or health educator is needed to

travel about the State and assist district personnel with promotional and educational campaigns. A planner, assistant planner, two aides, and a clerk will be needed to meet new planning requirements. A training officer is needed with necessary clerical assistance. These needs can be translated into an annual budget increase of about $380,000. (NOTE: Analysis of present staff salaries indicates a probable annual payroll of about $220,000. The total expenditure for FY 70 is given as $256,819. This indicates only $36,819 were spent for all other purposes. Fiscal Year 1971 has a probable payroll of $236,000 with other costs of $72,488. This is a doubling of other costs.) If we add the costs of these added needs to the present FY 1971 budget, it would translate to a cost of about 33¢ per capita.

It will be necessary for the agency to develop river basin, regional, or metropolitan water quality control plans. A copy of the Federal Register (July 2, 1970), Title 18-Conservation of Power and Water Resources-was sent to the WPC Agency July 8, 1970. The rules set forth in the register, regarding grants for water pollution control, require the development of river basin, regional, or metropolitan water quality control plans in order for the State and local agencies to receive FWQA grants.

Adopt adequate temperature criteria and anti-degradation policy statement.
Initiate effluent permit system.
Make monthly treatment plants operating reports mandatory.
Enact and fund 25 percent waste treatment matching grant program.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

Few important accomplishments over and above that reported in previous years' plans can be seen; however, those noted include:

a. Some improvements in the Water Quality Standards.
b. Enforcement action taken in several cases.
c. A $100,000 State financial assistance program for destitute communities for construction of waste treatment facilities.
d. One additional engineer hired.
e. Completed a few special problem studies.
f. Substantial increases in salary levels, particularly at the professional level. Salary increases should help in recruiting and retaining personnel.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 3 POLLUTION CONTROL SURVEILLANCE AND ENFORCEMENT

PLAN SECTION: 3.1 WATER QUALITY STANDARDS AND COMPLIANCE

EVALUATION RATING: ~~GOOD~~ ~~ADEQUATE~~ MARGINAL ~~POOR~~

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

The State Standards were approved by the Secretary October 21, 1968, with some exceptions. Revisions to correct exceptions have been prepared. State has intrastate standards.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

Update and revise Water Quality Standards.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Generally adequate.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Adopt revised Water Quality Standards to include:
adequate temperature and bacterial criteria,
revise use classifications on some surface waters,
anti-degradation policy statement, and
radioactivity criteria in Colorado River Basin which incorporates recommendations of Conferees.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 3 POLLUTION CONTROL SURVEILLANCE AND ENFORCEMENT

PLAN SECTION: 3.1 WATER QUALITY STANDARDS AND COMPLIANCE

EVALUATION RATING: ~~GOOD~~ ~~ADEQUATE~~ MARGINAL ~~POOR~~

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

The State Standards were approved by the Secretary October 21, 1968, with some exceptions. Revisions to correct exceptions have been prepared. State has intrastate standards.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

Update and revise Water Quality Standards.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Generally adequate.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Adopt revised Water Quality Standards to include:
adequate temperature and bacterial criteria,
revise use classifications on some surface waters,
anti-degradation policy statement, and
radioactivity criteria in Colorado River Basin which incorporates recommendations of Conferees.

5. ADDITIONAL COMMENTS:

Suggest that Colorado River at Dotsero be further investigated. The sludge handling and disposal facilities at Denver Metro needs improvement. All streams in the Mineral Creek Basin (Intra-State) should be classified.

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

Some revision of Water Quality Standards have been made.
Have held hearings on other changes to Water Quality Standards.
Temporary abatement of sludge disposal problem at Denver Metro.
Correction of pollution in Grand Junction Area.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 3 POLLUTION CONTROL SURVEILLANCE AND ENFORCEMENT

PLAN SECTION: 3.2 WATER QUALITY MONITORING

EVALUATION RATING: XGOOD ~~XADEQUATE~~ MARGINAL ~~XPOOR~~

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

Collected data from 85 sampling stations. Data system compatible with STORET System. Appears that most effort is directed to chemical - physical parameters and little effort to bacterial - biological parameters to determine water quality.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

A possible effort to sample ground water at Rocky Mountains Arsenal. A possible joint effort with FWQA in Colorado River Basin. (See number 5)
Budget a biologist position.
Special study of feedlot wastes.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Appears inadequate in matters of staff, budget, and organization.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Eliminate duplication of surveillance effort.
Collect more bacterial - biological data.
Recruit bacterial - biological laboratory staff. No bacteriologists or biologists appear to be employed at present. This is an extremely serious deficiency.

5. ADDITIONAL COMMENTS:

Possible duplication of effort with Colorado River Bonneville office on the Colorado River Basin project should be worked out. Suggest that a formal letter from State to FWQA requesting technical assistance

Recommend that the proposed Rocky Mountain Arsenal study be handled by a Federal Agency or consultant, and not the State.

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

Chemical - Physical data collected, analyzed and interpreted from 85 sampling stations.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 3 POLLUTION CONTROL SURVEILLANCE ENFORCEMENT

PLAN SECTION: 3.3 EFFLUENT CONTROLS

EVALUATION RATING: ~~GOOD~~ ~~ADEQUATE~~ MARGINAL ~~POOR~~

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

State does not require discharge permits. The agency does have the authority to approve waste treatment facilities prior to construction. Several cease and desist orders have been issued. Monthly plant reports are not required except in a few cases.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

NONE

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Inadequate. District personnel should visit and monitor plants operations more frequently. Legislation is needed establishing mandatory municipal and industrial waste disposal permit system.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Initiate effluent permit system.
Make monthly reports mandatory.
The State's present Contingency Plan needs to be expanded and improved. The FWQA Regional Office has and will continue to assist the State in improving their Plan.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

Collects voluntary monthly waste treatment plant operating reports. Since January, 1970, sixty-one of 212 municipalities reported and seven of 39 Federal activities reported.

Forty-two cease and desist orders issued with some compliance.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 3 POLLUTION CONTROL SURVEILLANCE AND ENFORCEMENT

PLAN SECTION: 3.4 INSPECTION OF TREATMENT PLANTS

EVALUATION RATING: GOOD ADEQUATE MARGINAL POOR

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

Annual inspection of 191 plants the past year and proposed inspection of 212 this year. The State does not run tests to validate results furnished them by operators. The activity appears marginal.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

NONE

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Staff to do needed inspection is inadequate and poorly located, they should be based nearer to plants rather than in Central Headquarters.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Employ needed staff to do inspections and provide capabilities to run validation tests on effluents. Begin routine inspections and reporting of all industries with private outfalls. Initiate routine industrial waste effluent analyses. Establish and staff regional offices.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

Made annual inspections of 191 municipal plants, four State-owned facilities, and six federally-owned installations.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 3 POLLUTION CONTROL SURVEILLANCE AND ENFORCEMENT

PLAN SECTION: 3.5 CERTIFICATION OF WASTE TREATMENT OPERATORS

EVALUATION RATING: XGOODX XADEQUATEX MARGINAL XPOORX

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

Has only a voluntary certification program with no legislative authority per se. While only a voluntary program, results have been better than expected. Through 1969 nearly 300 operators have been certified with a possibility of certifying another 80 this year.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

No improvements noted except for continuation of the voluntary program.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

The proposed 1960 Certification Act which was not enacted is very weak and provided only for voluntary actions. It would be a small first step toward Mandatory Certification.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Enact a mandatory operaters certification act.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

The State indicates that several more operators will be certified. The exact number of new certified operators is yet unknown as the test are still being graded. Thirty-one operators were certified last year and an additional 80 operators taking the tests this year.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 3 POLLUTION CONTROL SURVEILLANCE AND ENFORCEMENT

PLAN SECTION: 3.6 ENFORCEMENT AND REGULATION

EVALUATION RATING: ~~GOOD~~ ~~INADEQUATE~~ MARGINAL ~~POOR~~

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

Forty-two cease and desist orders issued. Apparently this procedure secures compliance in the majority of cases involving communities. The use against individuals does not appear particularly bright.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

NONE

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Though the State has taken enforcement actions against several violators, the agency's staff is not large enough to handle the enforcement program adequately.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Secure written agreement with State Highway Commission regarding use of sprays along right-of-ways. Develop and utilize enforcement procedures for non-municipal polluters.

At least once annually, obtain assistance from State Attorney General's Office in reviewing compliance status of all cease and desist orders, initiating legal action in those cases where unnecessary delays or no abatement results have been obtained.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

Forty-two cease and desist orders issued and in ten cases it appears compliance has occurred. Twenty cases appear to be in a small community and directed toward individuals. We do not consider "under design", "budget land for expansion" and "extension" as compliance.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 4 WATER POLLUTION CONTROL FACILITIES

PLAN SECTION: 4.1 REVIEW OF PLANS AND SPECIFICATIONS

EVALUATION RATING: GOOD ~~XXADEQUATEX~~ ~~FAIR~~ POOR

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

   All plans for proposed waste treatment facilities are reviewed (no statement as to "approval" before construction can commerce). Reviews could be more comprehensive as to individual plant components and systems, and should apply to existing plant components not to be abandoned as well as to new plants.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

   NONE

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

   Staff in headquarters may be adequate; however, additions to the staff could result in more detailed reviews of engineering reports, plans and specifications.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

   Engineering reports should be reviewed for adequate design considerations and approved before final plans and specifications are begun.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

Reviewed 80 plans.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 4 WATER POLLUTION CONTROL FACILITIES

PLAN SECTION: 4.2 MUNICIPAL CONSTRUCTION ASSISTANCE

EVALUATION RATING: GOOD ADEQUATE MARGINAL POOR

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

Assistance limited to occasional visits from "District" engineers headquartered in Denver and Health Educators, plus the new State Financial Assistance Act.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

Develop procedures to carry out provisions of new State Financial Assistance Act.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

The adequacy of the financial assistance is yet unknown; but the amount appropriated ($100,000) and wording of the statute limit the Act severely. It is unrealistic with distances to be covered by district engineers to have them all living and working out of Denver.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Move district engineers to district headquarters. Enact and fund 25 percent waste treatment matching grant program.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

Minimal form of State financial assistance created.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 4 WATER POLLUTION CONTROL FACILITIES

PLAN SECTION: 4.3 INDUSTRIAL WASTE TREATMENT ASSISTANCE

EVALUATION RATING: GOOD ADEQUATE MARGINAL POOR

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

Assistance is generally the same as for municipal construction - inadequate. No financial help is provided to industries.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

NONE

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

One man in agency has charge of review of industrial wastes treatment plants. Statutes may be adequate but needed assistance is lacking due to insufficient staffing.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Need at least a staff of three additional men. Review, approve, and inspect abatement plans and construction. Complete the industrial waste inventory to define magnitude of problem.

Provide tax exemption on the purchase of waste treatment equipment or a rapid tax write-off.

5. ADDITIONAL COMMENTS:

State depends upon FWQA to develop industrial needs list with little or no input from them. FWQA has had to rely heavily upon enforcement action for data.

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

NONE

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 4 WATER POLLUTION CONTROL FACILITIES

PLAN SECTION: 4.4 POLLUTION CONTROL PRIORITIES

EVALUATION RATING: ~~GOOD~~ ~~ADEQUATE~~ MARGINAL ~~POOR~~

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

One and five-year lists prepared according to instructions. Appears to be only that information needed to assure Federal participation.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

NONE

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Staff inadequate to develop long-range plans. Only three projects listed beyond this fiscal year, which is not realistic.

Organization may be adequate. Statutory authority exists.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Develop comprehensive basinwide water quality plans as outlined in new rules regarding construction grants (see Federal Register, dated July 2, 1970, and regulations promulgated subsequent thereto).

5. ADDITIONAL COMMENTS:

FWQA, Missouri Basin Region, will outline and hold conferences with State officials in the matters of required basin-wide water quality plans.

Every year there has been a sizable number of requests for additions to the one year needs list. This can only mean one thing--the State does not have sufficient knowledge of waste treatment needs. This is also reflected in the very small five-year needs list.

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

Develop required one and five-year lists.
These lists still reflect 1968 conditions.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 5 TRAINING

PLAN SECTION: 5.1 TRAINING OF WASTE TREATMENT PLANT PERSONNEL

EVALUATION RATING: ~~GOOD~~ ADEQUATE ~~MARGINAL~~ ~~POOR~~

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

State appears to sponsor and participate in adequate training programs.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

Encourages the community colleges to hold training sessions. Is attempting to develop a program for upgrading of operators with FWQA assistance.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Appears adequate.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Continue efforts to help community colleges develop training courses.
Utilize CAMPS program.
Maintain files on number of students and courses attended in future plans so that FWQA could assess needs and help develop solutions to problems.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

Conducted one week State-wide training program.
Conducted specialized courses at selected locations.
Encouraged Community College of Denver to offer 2-year technician program.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 5 TRAINING

PLAN SECTION: 5.2 STAFF TRAINING

EVALUATION RATING: ~~NEED~~ ADEQUATE ~~EXCESSIVE~~ ~~POOR~~

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

   Encourages staff to attend FWQA training courses.
   Provides education leave for academic training.
   Appears adequate although apparently no financial assistance.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

   NONE

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

   Appears adequate except that no mention is made of financial support of trainees.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

   Encourage training by providing financial assistance.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

UNKNOWN - not listed

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 6 POLLUTION CONTROL STUDIES AND PLANNING

PLAN SECTION: 6.1 POLLUTION CONTROL STUDIES

EVALUATION RATING: GOOXX ADEQUXDEX MARGINAL POOR

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

State lacks adequate staff and necessary expertise in the broad field of pollution problems.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

Determine feedlot waste needs.
Make solid waste management study in Denver area.
Initiate ground water study at Rocky Mountain Arsenal.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Very marginal.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Complete feedlot needs studies and mine waste inventory and determine needs and methods of abatement.
Request FWQA technical assistance for above.
The Rocky Mountain Arsenal study should be a Federal responsibility and developed in close cooperation with the State.

5. ADDITIONAL COMMENTS:

It appears time has come to begin earnest enforcement effort in the matter of sugar mill pollution. National surveys indicate that ways and means to completely abate or eliminate this source of pollution do exist. Complete remedial works should be constructed.

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

Return Flow (Irrigation) Summary of Research by Colorado State University with FWQA assistance. Preliminary studies of sugar industry compliance.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 6 POLLUTION CONTROL STUDIES AND PLANNING

PLAN SECTION: 6.2 PLANNING ACTIVITIES

EVALUATION RATING: ~~GOOD~~ ~~XXXXXXXX~~ ~~MARGINAL~~ POOR

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

The agency is not staffed for any real planning effort.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

NONE

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Inadequate at this time.
The Colorado Water Conservation Board has been designated as the State agency to receive and administer water resources planning grants.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Develop internal planning staff and coordinate their activity with water resources studies.
The State should have a multi-agency land and water resource planning commission with the WPC agency providing the water quality management input. The agency should also take an active role in the State comprehensive plan.

5. ADDITIONAL COMMENTS:

The new regulations requiring comprehensive basin plans before construction grant assistance can be given will require that the State initiate immediate planning studies. Under present conditions, the State could be seriously impaired or even prevented from receiving any assistance.

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

No specific long-range planning projects developed or proposed to date. Continuing to work to develop an up-to-date inventory of industrial waste needs and feedlot waste treatment needs.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 7 PUBLIC INFORMATION

PLAN SECTION:

EVALUATION RATING: ~~GOOD~~ ~~ADEQUATE~~ MARGINAL ~~POOR~~

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

State has a public information officer and a health educator to staff this function. These people assist news media to publicize actions of the agency. They also provide movies, pamphlets to groups asking, and prepare exhibits for public display. But, staff and budget are inadequate to do needed effort.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

NONE

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Inadequate

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Increase funding and provide sub-professional backup personnel. Suggest that a monthly or quarterly publication or press release be developed informing the public on what has, what is, and what needs to be done in the State.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

See Item 1.